



April 20, 2021

Lt. Colonel Mike Dunlap
Wisconsin Air National Guard; 115CES/CRIE
Dane County Regional Airport
3110 Mitchell Street, Building 120
Madison, WI 53704

Subject: Approval of Materials Management Plan for Modifications to Building 406,
Wisconsin Air National Guard 115Ces/CEIE, Dane County Regional Airport, Madison.
BRRTS #02-13-585319

Dear Lt. Colonel Dunlap:

The Wisconsin Department of Natural Resources received a Materials Management Plan (MMP) for modifications in and around Building 406 at the Wisconsin Air National Guard (WANG) base located at Truax Field in Madison. The MMP is dated April 11, 2021 and was sent to DNR on that same date. This work is part of actions necessary to prepare the base for the arrival of F-35 aircraft in 2023.

Building 406 is located near the northern end of the base and is slated to have modifications to interior walls and roof. The apron area in front (northwest) of Building 406 is slated to be replaced to accommodate the heavier F-35 jets.

Soil and groundwater samples were collected from six locations on the southwest, northwest, and north sides of the building. Samples were analyzed for Volatile Organic Compounds (VOCs) and for Per and Poly-fluoroalkyl substances (PFAS). Samples results were included in the April 11, 2021 submittal.

Soil

Soil samples were collected from six (6) locations on the southwest, northwest, and north sides of Building 406. The samples were placed approximately 20'-40' from the building. Soil samples were collected from each boring at a depth of 1'-2' and then approximately 1 foot about the water table or approximately 4'-5' below the ground surface.

One VOC, acetone, was detected at an estimated concentration of 1.97 mg/kg in boring E6-20 at the 1' depth. No other VOCs were detected in soil. This concentration is below levels of regulatory concern.

PFAS compounds were detected in four soil boring locations with the E1-20 (4") sample detecting five (5) individual PFAS compounds. PFHxS was at 5.14 ng/gm and PFOS was at 5.73 mg/gm. The other detected PFAS compounds (PFHxA, PFOA and PFNA) were less than 1 ng/gm.

WANG's MMP indicates that all soil excavated and removed as part of this project will be managed as a solid waste by placing in a solid waste landfill. This is an appropriate method for handling excess soil and base course material. Solid waste landfills in Wisconsin make the decision as to which wastes, they will and will not accept. WANG will need to arrange with the landfill for accepting the material. If an alternative method of soil management is desired, WANG must discuss the proposed management alternative with DNR prior to implementing.

Groundwater

Groundwater was sampled for VOCs and PFAS compounds at all six (6) sampling locations. A duplicate water sample was collected at locations E1-20 and E3-20.

Five VOCs (cis 1,2-DCE, PCE, toluene, trans 1,2-DCE, TCE) were detected in boring E5-20 and one VOC (toluene) was detected in boring E4-20. No VOCs were detected in the water samples from the other four sampling locations. The TCE concentration in E4-20 was 6.5 ug/l. This is slightly above the NR 140 Enforcement Standard of 5 ug/l.

Wisconsin currently does not have promulgated groundwater quality standards for any PFAS compounds. However, the Department of Health Services has recommended Enforcement Standards to DNR for several PFAS compounds. Fifteen (15) different PFAS compounds were detected in groundwater from the six sampling locations. All groundwater sampling locations except E6-20 contained concentrations of one or more PFAS compounds above recommended Enforcement Standards.

Groundwater dewatering is not anticipated for this construction project. This is based on depth to water from the borings completed at this location, and from experience WANG has gained from other construction project WANG has completed in the past. As such, DNR understands that WANG does not intend to seek a wastewater discharge permit ahead of construction activities. If groundwater is encountered the MMP stated the water will be containerized and sampled, and WANG will work with the DNR to review options for disposing the water based on sampling results.

Plan Approval

The Materials Management Plan is **approved** subject to the following conditions:

1. Management of excavated soil in conformance with the approved materials management plan shall be completed within one year of the effective date of this letter unless a written extension of this condition is obtained from the DNR.
2. The Wisconsin Air National Guard shall manage excavated material in conformance with the approved materials management plan and shall notify the DNR within 24 hours of discovering material that is not consistent with the contaminant characteristics that have been reported to the DNR or if there are visual or olfactory indications of a contaminant discharge. That material must be segregated and tested to determine appropriate disposal options.
3. If areas of unanticipated soil contamination or discovery of underground storage tanks, piping, drums, etc. are encountered, the DNR shall be notified within 24 hours and appropriate actions to investigate, evaluate, and deal with the situation shall be proposed. Notification of discharge shall be submitted to the Department in accordance with s. NR 706.05(1).
4. The Wisconsin Air National Guard is responsible for obtaining any local, federal, or other applicable state permits to carry out this project. If more than one acre of land is disturbed, a stormwater permit may be required. Contact the DNR's Stormwater Manager to determine what, if any, permit is needed.
5. The Wisconsin Air National Guard shall comply with requirements of s. NR 718.12(2)(d) and (e) Wis. Adm. Code as needed or appropriate.

6. The Wisconsin Air National Guard shall submit a documentation report to the DNR within 90 days of substantial completion of the redevelopment project. The report shall contain the following items:
 - a. As-built drawings documenting compliance with the above conditions of approval.
 - b. A narrative description of how the above conditions were accomplished including relevant documentation.
 - c. Color photographs documenting construction aspects addressed in this approval.
 - d. Documentation of excavation and soil placement activities. The report shall include the description of the total volume and final location/disposition of relocated material.

The DNR reserves the right to require the submittal of additional information or to modify or revoke this MMP approval if the Wisconsin Air National Guard fails to comply with the requirements of the proposed MMP. The DNR also retains its right to modify or revoke this approval if circumstances or conditions change, or if new information is found which would warrant modification or revocation of this approval.

If you have any questions regarding this approval please contact Steve Ales at stephenm.ales@wisconsin.gov or 608-400-9187.

Sincerely,

A handwritten signature in blue ink, appearing to read "St L Martin".

Steven L. Martin, P.G.
South Central Region Team Supervisor
Remediation & Redevelopment Program Supervisor

Cc: Steve Ales – Remediation & Redevelopment Program